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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY; BEASLEY
LAW GROUP PC; JEFFREY J. JUDD;
CHRISTOPHER R. HUMPHRIES; J&J
CONSULTING SERVICES INC., an Alaska
Corporation; J&J CONSULTING SERVICE,
INC., a Nevada Corporation; J AND J
PURCHASING LLC; SHANE M. JAGER;
JASON M. JONGEWARD; DENNY
SEYBERT; and ROLAND TANNER;

Defendants;

THE JUDD IRREVOCABLE TRUST; PAJ
CONSULTING INC; BJ HOLDINGS LLC;
STIRLING CONSULTING, L.L.C.; CJ
INVESTMENTS, LLC; JL2
INVESTMENTS, LLC; ROCKING HORSE
PROPERTIES, LLC; TRIPLE THREAT
BASKETBALL, LLC; ACAC LLC;
ANTHONY MICHAEL ALBERTO, JR.;
and MONTY CREW LLC;

Relief Defendants.

Case No. 2:22-cv-00612

RESPONSE TO ACCOUNTING
ORDERED PURSUANT TO APRIL 13,
2022 TEMPORARY RESTRAINING
ORDER [ECF NO. 3]

Pursuant to the accounting ordered in the Court's April 13, 2022, Temporary Restraining Order (hereinafter the "TRO"), at ¶ X, Defendant Denny Seybert (hereinafter "Seybert") responds as follows:

Bank Accounts:

| Financial Institution | Name of Account | Owner | Account No. | Open |
|-----------------------|---------------------------------|---------------------------------------|-------------|-----------|
| Wells Fargo | LV Capital LLC, | Denny D Seybert 50% Coltny Simmons | XXXXXXX921 | 1/15/2020 |
| Wells Fargo | Denny D Seybert & Julie Seybert | Denny D Seybert & Julie Seybert | XXXXXXX764 | 4/15/2012 |
| Bank of America | Denny D Seybert | Denny D Seybert | XXXXXXX987 | 3/15/1997 |
| Credit Union 1 | Denny D Seybert | Denny D Seybert | UNKNOWN | 2/15/1992 |
| Bank of Nevada | Quarter Horse Associates LLC | Denny D Seybert, manager | XXXXXXX555 | 8/15/2005 |
| Chase Bank | C&C Group Holdings LLC | Denny & Julie Seybert | XXXXXXX969 | 12/1/2011 |
| Bank of the West | C&C Group Holdings LLC | Denny & Julie Seybert | XXXXXXX938 | 7/15/2016 |
| US Bank | Denny D Seybert & Julie Seybert | Denny & Julie Seybert | XXXXXXX465 | 7/15/2015 |
| Wells Fargo | Rockinghorse Properties LLC | Denny D Seybert | XXXXXXX429 | 6/15/1997 |

*complete bank account numbers will be provided in a supplement hereto, if necessary.

Real and Personal Property:

| Asset | Description | Percent Owner | Acquired |
|-------------------|------------------------------------|---------------|-----------|
| 4524 Garden Place | Rental property with rental income | 100% | 11/6/2015 |
| 570 Karen Way | Rental Property with rental income | 100% | 5/26/2016 |
| 331 Tungsten St | Rental property with rental income | 100% | 1/28/2016 |
| 338 Tungsten St | Rental property with rental income | 100% | 2/3/2015 |
| 259 W Basic Rd | Rental property with rental income | 100% | 4/11/2012 |

| | | | | |
|----|---|---|------|------------|
| 1 | 243 W Basic Rd | Rental property with rental income | 100% | 11/6/2012 |
| 2 | 1041 N Michael Way #255 | Rental property with rental income | 100% | 8/21/2015 |
| 3 | 2305 W Horizon Ridge Pkwy #3913 | Rental property with rental income | 100% | 9/30/2003 |
| 4 | 251 W Basic Rd | Rental property with rental income | 100% | 5/13/2011 |
| 5 | 254 W Basic Rd | Rental property with rental income | 100% | 12/27/2012 |
| 6 | 247 W Basic Rd | Rental property with rental income | 100% | 5/2/2002 |
| 7 | 1104 Snow Roof Ave | Rental property with rental income | 100% | 11/10/2005 |
| 8 | 2176 Skyline Heights Ln | Main family residence | 100% | 12/19/2018 |
| 9 | 12245 Carmel Vista Rd #192, San Diego, CA | Second home, occasionally AIRBNB | 100% | 4/6/2021 |
| 10 | 1087 W Dixie Lane, Panguitch Lake, UT | Second home, occasional rental | 100% | 7/6/2018 |
| 11 | 1098 Lake Pointe Dr, Bigfork, MT | Second home, will be occasionally AIRBNB | 100% | 12/2/2021 |
| 12 | 2017 Tesla | Spouse's vehicle. Located in Henderson NV | 100% | 12/15/2016 |
| 13 | 2020 Chevy Suburban | Personal Vehicle. Located in Henderson NV | 100% | 7/25/2020 |
| 14 | 2022 Chevy Silverado Pick Up | Personal Vehicle. Located in Bigfork MT | 100% | 12/18/2021 |
| 15 | 2016 Tige Ski Boat & trailer | Personal leisure boat in Boulder City NV | 100% | 1/15/2017 |
| 16 | 2007 Lund Boat & trailer | Personal fishing boat in Panguitch UT | 100% | 7/15/2020 |
| 17 | 2013 Razor ATV & trailer | Personal leisure ATV in Panguitch UT | 100% | 6/15/2013 |

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|---|--|--|--------|------------|
| 1 | Rockinghorse Properties LLC | LLC belonging to Denny Seybert for real estate activities. | 100% | 6/30/1997 |
| 2 | C&C Group Holdings LLC | LLC belonging to Denny Seybert and Julie Seybert for family properties. | 100% | 11/7/2011 |
| 3 | JER2911 LLC | LLC that owns and operates a real estate brokerage as an ongoing business. 26.5% owner. Silent Investor. Ownership as Rockinghorse Trust. | 26.50% | 6/1/2012 |
| 4 | Hobbyhorse Associates LLC | LLC that owns and operates a real estate brokerage as an ongoing business. 50% owner. Silent Investor. Ownership as Rockinghorse Trust. | 50% | 10/1/2005 |
| 5 | Southern Nevada Real Estate Services LLC | LLC that owns Vegas Title. A proposed/inactive escrow company. Ownership as Rockinghorse Trust. | 50% | 9/15/2018 |
| 6 | Buckhead Investments 2018 LLC | LLC that is used for real estate deals. Currently one such property. 50% owner thru spouse; Julie Seybert. | 50% | 9/15/2018 |
| 7 | Cavalo Holdings LLC | LLC for the holding and management of commercial office space. 50% owner. Silent owner. Ownership as Rockinghorse Trust. | 50% | 12/15/2013 |
| 8 | Quarter Horse Associates LLC | LLC for the holding and management of 160 acres piece of land in Phoenix area, AZ. Approx 18% owner of LLC. Ownership as Rockinghorse Trust. | 18% | 6/15/2005 |

1 Investigation and compliance with this TRO is ongoing and Seybert reserves the right
2 and shall supplement this Response as more information becomes available.
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4 DATED this 21st day of April, 2022.
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11 By: /s/ Lance A. Maningo
12 LANCE A. MANINGO
13 Attorney for Defendant SEYBERT
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17 **CERTIFICATE OF SERVICE**
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20 I HEREBY CERTIFY that I am an employee of MANINGO LAW, and that on the
21 21st day of April, 2022, I served the foregoing RESPONSE TO ACCOUNTING ORDERED
22 PURSUANT TO APRIL 13, 2022 TEMPORARY RESTRAINING ORDER [ECF NO. 3]
23 via electronic service on the parties as shown below:
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25

26 TRACY S. COMBS, Esq.
27 combst@sec.gov
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29 CASEY R. FRONK, Esq.
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31

32 /s/ Kelly Valenti
33 An Employee of MANINGO LAW
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